

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**ALLEN J. HANSON, *pro se*,**  
*Plaintiff*

**v.**

**STATE OF RHODE ISLAND DEPARTMENT  
OF CORRECTIONS, *et al.*,**  
*Defendants*

**C.A. No. 1:17-cv-00598-WES-PAS**

**STATE'S OBJECTION TO PLAINTIFF'S MOTION TO PRESERVE  
CCTV FOOTAGE (ECF 72)**

NOW COMES the Defendant, State of Rhode Island, Department of Corrections, ("RIDOC" or the "State") and hereby objects to the Motion to Preserve CCTV Footage, ECF 72, filed by the Plaintiff, Allen J. Hanson ("Hanson" or "Plaintiff"). In support thereof, the State asserts that it is not in possession of the CCTV footage Plaintiff seeks and has twice advised Plaintiff of the same. *See* State's Response to Plaintiff's First Request for Production of Documents at Response 1 and 2; State's Response to Plaintiff's Second Request for Production of Documents at Response 3, 4 and 6.

WHEREFORE, the State prays that this Honorable Court deny Plaintiff's Motion to Preserve CCTV Footage, ECF 72.

Respectfully Submitted,

Defendant,  
STATE OF RHODE ISLAND,  
DEPARTMENT OF CORRECTIONS,  
By:

PETER F. NERONHA  
ATTORNEY GENERAL

/s/ Justin J. Sullivan

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the within document was filed via the ECF filing system on Tuesday, March 10, 2020 and that it is available for viewing and downloading. I also hereby certify that I mailed a copy of the within document by first class mail, postage prepaid on Tuesday, March 10, 2020 to:

Allen J. Hanson (Inmate ID #129924)  
Adult Correctional Institute, Maximum Security  
P.O. Box 8273  
Cranston, RI 02920

/s/Justin J. Sullivan

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